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9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 United States of America,

Case No. 2:19-cr-251-GMN-NJK-2

12 Plaintiff,

**Unopposed Motion to Modify
Conditions of Pretrial Release**

13 v.

14 Esperanza Sanabia-Araujo,

15 Defendant.

17 The defendant, Esperanza Sanabia-Araujo, by and through her counsel of
18 record, Katherine Tanaka, Assistant Federal Public Defender, files this Unopposed
19 Motion to Modify Conditions of Pretrial Release. This request is based on the
20 Points and Authorities attached hereto.

21 DATED this 1st day of April, 2020.

22 RENE L. VALLADARES
23 Federal Public Defender

24 By: /s/Katherine Tanaka

25 KATHERINE TANAKA
26 Assistant Federal Public Defender
Attorney for Esperanza Sanabia-
Araujo

Points and Authorities

1) On October 3, 2019, this court released Mrs. Sanabia on a personal
recognition bond with conditions.¹ One of the conditions required that
Mrs. Sanabia submit to location monitoring with GPS and curfew.²

2) Mrs. Sanabia requests that the location monitoring condition (and its sub-conditions) be removed. She has been subject to location monitoring for approximately six months. She has been fully compliant with that condition as well as all her other conditions.

3) Defense counsel has been in contact with Mrs. Sanabia's pretrial officer, Samira Barlow. Mrs. Barlow has confirmed Mrs. Sanabia's compliance and has no opposition.

5) Defense counsel has also been in contact with the government.

Government counsel similarly has no opposition.

Dated this 1st day of April, 2020.

Respectfully submitted,

RENE L. VALLADARES
Federal Public Defender

By: /s/*Katherine Tanaka*

KATHERINE TANAKA
Assistant Federal Public Defender
Attorney for Esperanza Sanabia-
Araujo

¹ ECF No. 24.

² *Id.* (conditions 50A, 51D, 52, and 53).

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2 **UNITED STATES DISTRICT COURT**
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4 **DISTRICT OF NEVADA**

5 United States of America,

6 Plaintiff,

7 v.

8 Esperanza Sanabia-Araujo,

9 Defendant.

10 Case No. 2:19-cr-251-GMN-NJK-2

11 **PROPOSED ORDER**

12 IT IS ORDERED that Mrs. Sanabia's pretrial release conditions shall be
13 modified to remove her location monitoring conditions (50A, 51D, 52, and 53).

14 DATED this 2nd day of April 2020.

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17 UNITED STATES MAGISTRATE
18 JUDGE

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